

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

	)	
GETRONICSWANG CO., LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 04-12382(RCL)
	)	
HYNIX SEMICONDUCTOR, INC.,	)	
SAMSUNG ELECTRONICS CO.,	)	
LTD.	)	
	)	
Defendants	)	
	)	
	)	

**AFFIDAVIT OF JAMES P. HARRIS, ESQ. IN SUPPORT OF PLAINTIFF'S  
MOTION FOR SUMMARY JUDGMENT**

I, James P. Harris, hereby depose and state as follows:

1. I am an attorney licensed to practice in the State of New Hampshire and have been admitted pro hac vice to appear before this Court in the above-captioned matter. I have assisted in the representation of Plaintiff GetronicsWang, L.L.C. in this matter.
2. Attached hereto as Exhibits 1-2 are true and accurate copies of the Defendants' Responses to Plaintiff's Requests for Admissions and exhibits thereto.
3. Attached hereto as Exhibit 3 is a true and accurate copy of the June 26, 1992 letter from Samsung to Wang that was Exhibit 9 to the deposition of Anthony Paolillo (Paolillo Depo.'').

4. Attached hereto as Exhibit 4 is a true and accurate copy of the June 5, 1992 letter from Goldstar to Wang that was Exhibit 12 to the Paolillo Depo..
5. Attached hereto as Exhibit 5 is a true and accurate copy of the August 26, 1993 letter from Hyundai to Wang that was Exhibit 25 to the Paolillo Depo..
6. Attached hereto as Exhibit 6 is a true and accurate copy of the June 20, 1992 letter from Samung to Wang that was Exhibit 15 to the Paolillo Depo..
7. Attached hereto as Exhibit 7 is a true and accurate copy of the January 14, 2002 letter from Hynix to Getronics that was Exhibit 40 to the Paolillo Depo..
8. Attached hereto as Exhibit 8 is a true and accurate copy of the July 24, 1996 letter sent on behalf of Wang to the Internal Revenue Service ("IRS") that was Exhibit 29 to the Paolillo Depo..
9. Attached hereto as Exhibit 9 is a true and accurate copy of selected portions of the Tax Convention with the Republic of Korea, June 4, 1976.
10. Attached hereto as Exhibit 10 is a true and accurate copy of the October 16, 2002 letter from the IRS to Getronics that was Exhibit 52 to the Paolillo Depo..

This ends my affidavit testimony.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY.

January 20, 2006

/s/ James Harris  
James P. Harris